

## **CHOICE HOUSING IRELAND LTD'S MODERN SLAVERY STATEMENT 2022**

The Modern Slavery Act 2015 (the Act) requires organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement. The objectives of the Act are fully supported by Choice Housing Group and we are committed to improving our practices to combat slavery and human trafficking in our supply chains.

Choice Housing Group (Choice) is publishing this statement setting out what it has done to recognise and prevent potential incidences of modern slavery in the Financial Year 2022/23.

### **ORGANISATIONAL STRUCTURE**

We are an independent housing association in Northern Ireland, providing homes, care and support services to a wide range of customers including; older people, families, mature singles and people with complex needs. We are a part of the Choice Housing Group, and our ultimate parent company is Choice Housing Ireland Limited having its head office in Northern Ireland. The Group has over 409 employees and operates throughout Ireland. The Group has a global annual turnover of over £75 million.

We operate in property development and management, from the initial procurement of sites, through planning to the delivery and management of high-quality communities across a range of tenure types and housing solutions. Choice is committed, as both an employer and as a landlord, to running our business responsibly. By creating more places to thrive, we will protect and enhance the communities we work for and with.

### **OUR BUSINESS**

Our business is organised into several business units including the following:

Finance & Resources (which includes Procurement); Development and Assets (which deals with asset management and development of new builds); Tenant and Client Services (which deals with housing allocation, estate management, income recovery, care and support, property services and our customer contact centre); and Corporate Services (which includes HR, marketing and communication, and ICT).

Each unit has a dedicated group director. The Group Chief Executive has overall responsibility for the actions of these units. The Group Chief Executive then reports to the board of directors of Choice Housing Ireland Limited.

### **OUR SUPPLY CHAINS**

Our supply chains include the sourcing of a wide range of services used by the Group. All of those service providers are selected through a procurement process. The services that the Group tenders for include but are not limited to the following:

- design team appointments;
- new build and re improvement work contractor appointments;
- design and build contracts;
- measured term response maintenance and repair contracts;
- planning consultant services
- grounds maintenance services
- anti-social behaviour response services
- cleaning
- all other professional services

## **OUR POLICIES & PROCEDURES**

We continue to review our existing policies and procedures in light of the Act in accordance with our internal governance procedures. We are confident that our policies promote good behaviour among our colleagues both at work and within our supply chain. Our policies and procedures are kept under review to make sure that they reflect the Group's evolution and our regulatory and statutory obligations.

We have a number of policies and procedures in place, all of which have been updated, that contribute to ensuring modern slavery does not occur in our business or supply chain which includes:

- Employee Code of Conduct;
- Anti -Fraud & Bribery Policy;
- Whistleblowing Policy;
- Choice Procurement Procedures – in line with NI Public Procurement Policy;
- Recruitment and Selection Procedure

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we have provided training to relevant members of staff, typically “front line” staff working in our communities. The training was reviewed and updated during 2020/21 to ensure that it remains relevant and reflects existing best practice.

During mandatory staff induction, the area of modern slavery is highlighted. Our Scheme Coordinators complete an online Safeguarding course the content of which includes modern slavery.

Standalone modern slavery training was piloted in 2021 provided by an accredited 3rd party training organisation. This proved successful and was rolled out to key staff in 2021. Attendance at this training is tracked and recorded by our Learning and Development Team.

## **RECRUITMENT**

Our approach to recruitment and selection contains relevant requirements in terms of checking of eligibility to work in the UK and carrying out the necessary checks such as DBS (Disclosure and Barring Service). For every successful application, we check proof of eligibility to work in the UK; this initially is by way of a question upon application and then verification of relevant documentation before/after the interview. This is by the production of a valid passport, or via other means such as a full birth certificate. For roles that require DBS clearance; each relevant role clearly states the requirement for DBS and the level of DBS associated with that role and the relevant DBS is undertaken for all offered candidates where it is a role requirement.

References are also taken for every potential new starter covering two years full career history and a minimum of two references – if there are any gaps in employment greater than one month we will investigate and clarify the gap and where possible, seek a character reference.

## **SUPPLY CHAINS**

The Procurement Team has set procedures for the assessment and due diligence of suppliers which includes standard selection or eligibility questions including specific questions on modern slavery which asks all bidders to demonstrate that they comply with the Act. Our standards are fully compliant with all legislation relating to public procurement, including those around modern slavery.

Choice publically advertises all tendering opportunities above £30k via eTenders NI. The goods, works and services that Choice typically purchases tend to be from industries that are highly regulated such as law, asset safety, compliance and are therefore of a lower risk for modern slavery. However, Choice continues to enhance the assurances we seek from supply chain members as to their avoidance of modern slavery and human trafficking. For those suppliers Choice uses in higher risk supply chains, such as construction and supply of materials, Choice conducts additional checks such as site visits carried out by 3<sup>rd</sup> party consultant design teams and in house clerk of works.

### **MODERN SLAVERY and COVID-19**

Measures announced in early 2020 to tackle coronavirus (COVID-19) saw people's day-to-day lives drastically altered. Whilst these changes were essential to beat coronavirus and protect the NHS, modern slavery is a harmful and hidden crime and its victims may have been especially isolated and hidden from view during the coronavirus outbreak. Choice remains committed to tackling the issues of modern slavery during this time and are ensuring that we remain vigilant to the risks.

Choice implemented a series of additional welfare calls and checks to customers, particularly those most vulnerable. This enabled us to continue to monitor issues of safeguarding and modern slavery during these unusual circumstances. Training has been provided to staff undertaking calls to ensure they are aware of the need to report any safeguarding issues or concerns.

During the COVID-19 pandemic Choice made a number of adjustments to the recruitment process. Following a brief freeze on all recruitment, this was recommenced and facilitated via MS Teams and Zoom interviewing techniques to limit face to face contact. We continue to adopt these practices and will closely monitor all recruitment activities.

Learning and development have adapted induction and training sessions to convert these to online sessions to limit face to face contact and have added a number of e-learning courses for essential health and safety training and COVID-19 training. As part of the induction process, all staff undergo training in safeguarding issues. Essential health and safety training sessions are planned, and facilities have been risk assessed.

Emerging developments are monitored, and additional health and safety forums established to discuss the changing picture and undertake risk and impact assessments for Covid-19, this includes information in relation to safeguarding staff and customers. Information is cascaded to staff and customers using a range of communication methods.

Choice have taken additional measures to protect its supply chain and businesses from risks associated with Covid-19 which could lead to an increased risk around modern slavery. Choice speaks regularly to its suppliers and remain vigilant about their financial status, their ability to keep working for us to ensure that they are able work safely both now and after any return from furlough. Choice continues to follow government guidance, making extra payments or reviewing payment terms where necessary to ease operating pressures and safeguard incomes and jobs.

### **CHOICE AND IMPLEMENTING SOCIAL VALUE**

An important initiative to deliver social value is the Buy Social Model which the Procurement Board approved in 2015. The Buy Social Model specifically addresses key quality of life indicators such as: personal well-being, social cohesion and inclusion, equal opportunities and sustainable

development. Over this period many public bodies have been highly innovative in their use of public procurement to promote social value, including the scoring of social value criteria.

From 1 June 2022, tenders must include a minimum of 10% of the total award criteria to score social value. Organisations who are required to adhere to the Public Procurement regulations including Choice are being encouraged to score for social value in advance of 1 June 2022 if possible. This 10% minimum will apply to contracts for services and works above the threshold where the Procurement Regulations apply (i.e., services contracts valued above £122,976, and construction contracts valued above £4,733,252). Where appropriate, organisations can also score for social value on contracts outside of these thresholds. They can also give greater weight to social value than the 10% minimum.

Choice is committed to adhering to this approach and work is underway to amend policies and procedures to ensure that it is undertaking tender activities in line the Procurement Policy Note (PPN) 0121. A paper is being prepared setting out recommendations which will be presented to the Choice Board for approval in April 2022.

### **OUR ON-GOING COMMITMENT TO THE MODERN SLAVERY ACT 2015**

We are committed to ensuring as far as possible that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our commitment is to act ethically and with integrity in all our business relationships and to implement effective systems and controls to ensure slavery and human trafficking is not taking place. We are further committed to making sure that our properties are not used to accommodate the work of human traffickers or detain others for servitude and work with a range of agencies, including the police and local authorities to ensure that Information is shared, and action is taken if necessary.

In support of this, further development of the training provided by Choice is currently under review and ensuring all staff have access to it. This training uses real life examples provided by the PSNI as case studies, demonstrating this is a local issue happening in our communities. We seek to ensure staff know the signs to look out for, undertaking monitoring questionnaires with our suppliers and continuing to adapt our activities taking into account the changes caused by Covid-19.

Public procurement is highly regulated and Choice is subject to the rules, regulations and due diligence around this. All our procurement activity is governed by these regulations.

### **OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have implemented an anti-slavery policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our learning and development team deployed modern slavery awareness training in 2021.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have (through our procurement team) systems in place to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Monitor potential risk areas in our supply chains.

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have dedicated compliance procedures.

## **DECLARATION**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2022. This statement was approved by the board of directors of Choice Housing Ireland Limited on 28<sup>th</sup> February 2022.